



United States
Environmental Protection
Agency

Region 10
1200 Sixth Avenue
Seattle WA 98101

I need to determine if their waste

USB →

UBLS →

Fail concisive test

Fail EP Toxic Test

Listed Waste →

2-Way Memo

Subject:

RCRA Inspection
Monsanto - Seattle

To :

Don Donaldson ~~Don~~
M/s 513
Compliance BranchThrough Ben Eusebio *BE*

FOLD

INITIAL MESSAGE

Attached is Jim Hileman's report on the subject site. DOE's official report will follow through their Olympia office.

Jim's report reflects no problems with the facilities operation under interim RCRA status.

REPLY MESSAGE

From :

NA 2302 42

INSTRUCTIONS 7/24/81

Use routing symbols whenever possible.

SENDER (Originator of message):

Use brief, informal language.

Conserve space.

Forward original and one copy.

RECEIVER (Replier to message):

Reply below the message, keep one copy, return one copy.

DATE OF MESSAGE

7/24/81

ROUTING SYMBOL

2

SIGNATURE OF ORIGINATOR

John E. Osborn

TITLE OF ORIGINATOR

Environ. Engineer

FOLD

RECEIVED
JUL 30 1981
PERMITTS BRANCH
EPA REGION 10

INSPECTION EVALUATION-

Mike Brown & Assoc.
Name & title evaluator

RCRA		TSCA		FIFRA	
------	--	------	--	-------	--

ACTION TAKEN

☒ No Action Indicated

☐ Violation Assessment

☐ Letter of Non-Compliance

☐ Referral for Admin. Civil Penalty

☐ Referral for Criminal Action

☐ Refer to State

☒ Status

Jane Selbach
Name of inspector

7-23-81
Date of inspection

Monsanto Co

9229 East Marginal Way S.

Seattle, WA 98108

Establishment Name & Address
G T TSD

COMMENTS:

Date line

1	Notification	
2	Part A	
3	Inspection	
4	EPA Rec'd	
5	Prelim Review	11-2-81
6	Final Review	11-11-82
7	D2 sig	
8	Legal Action	
9	Closed (file)	11-4-82
10		

→ Although a TSD facility, HW not stored longer than 90 days

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

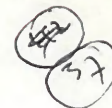
DATE: October 15, 1981

SUBJECT: ISS Inspection- Monsanto

FROM: Philip Wong, Washington Operations Office

TO: Don Donaldson, Team Leader

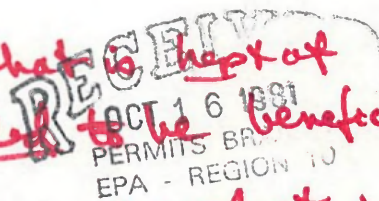
In total review MJB
10-30-81



Following are my comments on the attached WDOE ISS inspection report:

1. The waste is shown to have been analysed but no results are shown. Monsanto believes the vanillin black liquor (vbl) sludge could go to a municipal landfill but chooses to ship to Arlington. Transport is in open trucks so the waste must not be hazardous. VBL itself is often greater than pH 12.5 but the sludge may not be.
2. Quantities of wastes are unknown. Storage is in piles on a concrete base with runoff control.
3. There was a spill of VBL into the Duwamish River from this site on 2/4/80.

Since the VBLS & USB that is kept at the plant is not intended to be beneficially used, re-used, recycled, or reclaimed it is fully regulated by RCRA.



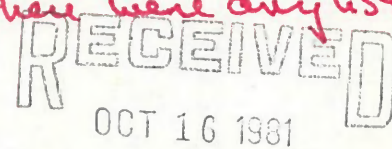
Fails corrosivity test - Yes > 13.0 (sometimes)

Fails EP Toxicity test - ~~Yes~~ → Passed

Fails listed Waste - ~~Yes~~ Volatile

12:00
11-2-81

call Sue Hayes to see if there were any listed waste. Yes Volatile



COMPLIANCE BRANCH
EPA - REGION X

10-30-81
10-30-81

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

October 15, 1981

125 Inspection - Monsanto

Philip Wong, Washington Operations Office

Don Donaldson, Team Leader

Following are my comments on the attached WDOE 125 inspection report:

1. The waste is shown to have been analyzed but no results are shown. Monsanto believes the vanillin black liquor (VBL) sludge could go to a municipal landfill but chooses to ship to Arlington. Transport is in open trucks so the waste must not be hazardous. VBL itself is often greater than pH 12.5 but the sludge may not be.
2. Quantities of waste are unknown. Storage is in piles on a concrete base with runoff control.
3. There was a spill of VBL into the Duwamish River from this site on 3/4/80.

Is the waste to be kept at the plant or is it intended to be landfilled? Is the waste to be landfilled, it is fully regulated by RCRA.

Fail/Consequence - for 125.0 (consequence)
Fail/EP Trench test - for 125.0 (consequence)
Fail/Initial Waste - for 125.0 (consequence)

Coliform Bacteria to see if there were any coliform bacteria. For reference

COMPLIANCE BRANCH
EPA - REGION X

11-5-81
11-5-81

Type of Notification: Interim Status Inspection I.D.# WAD009282302

Site Name: Monsanto Company, Seattle Plant Address: 9229 East Marginal Way S.
Seattle, WA 98108

Facility Contact(s): (1) Melvin Miller - 4481
 (2) Sue Hays - 4434

(1) Technical Service Department Superintendent
 Title: (2) Environmental/Industrial Hygiene, Senior Chemist Phone No.: (206) 764-4450
764-4434

Owner: Earle H. Harbison, Jr., Group V.P. & Managing Director

Location: (Long., Lat., or Sec., Range, Twnshp.) 47-30-56 N.
122-18-10 W

The Company acknowledges the following hazardous waste handling:

ALL 1. What type of ACTIVITIES are performed at the facility?

- ☒ GENERATE
- ☐ TREAT/RECYCLE
- ☒ STORE
- ☐ DISPOSE
- ☐ TRANSPORT (# OF VEHICLES)
- ☐ CLAIM QUANTITIES TOO SMALL TO BE REGULATED

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 OCT 16 1981
 PERMITS BRANCH
 EPA - REGION 10

ALL 2. TYPE OF WASTE handled? (Chlorinated hydrocarbons, electroplating, sludge, etc.) Amount/mth, amount/yr?

Byproducts of vanillin-making process
 3% of total VBLS (Vanillin Black Liquor Sludge) and VSB (Vanillin Still Bottoms) go to Arlington, OR, each year; the rest is sold to other companies for use in their processes.

ALL 3. ADDITIONAL:

A. Has the waste material been ANALYZED? By whom?

Need to know
 if VBLS or VSB
 has any listed
 hazardous waste?

Yes; EP toxicity, high pressure liquid chromatography, and priority pollutant analysis have been done

{ Analysis has been done at the lab on-site at this plant, and off-site at the St. Louis Monsanto lab and other outside labs.

→ Valuene? →

T/S/D

B. Is the property FENCED? Are gates kept locked after hours?

Yes ; Yes

T/S/D

C. Is the property posted with SIGNS reading "Unauthorized Personnel Keep Out.", or similar warning sign?

Yes

T/S/D

D. List other means to prevent UNAUTHORIZED ENTRY.

None

T/S/D

E. Is there a written INSPECTION SCHEDULE available?

Yes , on a weekly or as used basis by Sue Hays or Mel Miller

T/S/D

F. Is an INSPECTION LOG kept?

Yes ; the log is filled out at least twice each week

T/S/D

G. Is there a TRAINING PLAN for personnel? What is the status of its implementation?

Yes ; Complete and on going

T/S/D

H. Are TRAINING RECORDS kept?

Yes

T/S/D

I. Are incompatible WASTES SEGREGATED?

Yes ; there are no incompatible wastes stored on site

T/S/D

J. Is there FIRE FIGHTING EQUIPMENT on site?

Yes ; hose station, fire hydrants and fire extinguishers

There is a foam system on order for alcohols and solvents

T/S/D

K. Is there AN ALARM SYSTEM on site?

Yes ; they are hooked up to ADT.

They also have a reciprocity agreement with Boeing

T/S/D

L. Is there READY ACCESS to FIRE equipment and the ALARM system by personnel?

Yes

T/S/D

M. Is there ADEQUATE AISLE SPACE and access to all parts of the facility?

Yes

T/S/D

N. Is there a CONTINGENCY PLAN available?

Yes ; Addendum to Spec plan

T/S/D

O. Is there an EMERGENCY COORDINATOR identified?

Monisanto is an emergency response coordinator

McI Miller is the emergency coordinator for this plant

ALL 4. Is the MANIFEST SYSTEM used? What information is missing from manifest?

Yes ; they deal directly with Chem Security for transportation of their wastes

T/S/D 5. Do OPERATING RECORDS include:

A. SOURCE, AMOUNT, and TYPE of wastes received.

DNA ; they do not receive any wastes

B. RESULTS of analyses.

Yes

C. LOCATION of stored wastes.

Yes

D. FINAL DISPOSITION of wastes.

Yes

T/S/D 6. Is GROUNDWATER MONITORED?

No ; they have had a preliminary hydrogeologic survey performed - the data is currently undergoing evaluation.

T/S/D 7. Is CLOSURE and POST-CLOSURE PLAN acceptable?

Yes

G/T/S/D 8. Are there INTERNATIONAL SHIPMENTS of wastes? Reported?

No

9. BARREL STORAGE: DNA ; their waste are not shipped in drums, but rather as piles in dump trucks

T/S/D

A. Any STORAGE CONTAINERS not meeting requirements?

T/S/D

B. Any examples of INADEQUATE LABELING of containers?

T/S/D

C. Are there 50' SET BACK violations of ignitable or reactive wastes?

G

D. Is there evidence indicating STORAGE greater than 90 days?

10. BULK STORAGE: DNA

G/T/S/D

A. Are BULK TANKS used to store hazardous wastes?

G/T/S/D

B. Are there TANK INSPECTION records?

G/T/S/D

C. Are there examples of IMPROPER MAINTENANCE of transfer equipment? Maintenance plan?

11. TRANSPORTERS: DNA

T

A. How many VEHICLES in use?

T

B. List how many of each TYPE.

C. Comments:

12. LAGOONS/IMPONMENTS: DNA

A. Are IMPONMENTS used to hold hazardous wastes? T/S/D

B. Are such imponments LINED? T/S/D

C. Is there evidence of LEACHATE or LEAKING or OVERFLOW? T/S/D

13. PILES:

A. Is LEACHATE and RUNOFF COLLECTED? G/T/S/D

Yes; collected leachate and runoff is piped to the VBL and VBS tanks

B. Is there need for an IMPERMEABLE BOTTOM? G/T/S/D

Yes; they have 1 foot of reinforced concrete as a base

14. LANDFARM/LANDFILL: DNA

A. Hazardous waste used in a:

1) LANDFARM D

2) LANDFILL D

B. Evidence of NON-CONTAINMENT of runoff or leachate problem. D

C. Improper RECORDS of type of material and location in the fills? D

D. Are LIQUIDS landfilled? D

D E. Is landfill LINED?

15. INCINERATION: DNA

T/D A. Is waste ANALYZED prior to incineration?

B. Comments:

16. THERMAL TREATMENT: DNA

T/D A. What PROCESS is used? Are there problems?

B. Comments:

17. CHEMICAL/PHYSICAL/BIO-TREATMENT: DNA

T A. What PROCESS(ES)?

B. Comments:

18. INJECTION: DNA

D A. Describe:

19. ANNUAL REPORT:

A. Are records sufficient for compiling required ANNUAL REPORT?

Yes ; manifests are used to file Annual Generator reports

20. COMMENTS: Approximately 97% of Monsanto's Seattle plant wastes are sold and shipped to other companies for use in their processes. The rest of Monsanto's waste consists of VSB and VBS and is shipped in the solid form (via dump trucks) to Arlington, OR. These wastes could be disposed of at the municipal landfill, but Monsanto made a corporate decision (based on the condition of the Cedar Hills landfill) to transport their wastes to Arlington.

This plant is applying as a storer, although it actually only accumulates waste for 30-45 days, because they want the capability of storing their wastes longer in case the Arlington disposal site were to close.

21. Prior HISTORY OF ENFORCEMENT or violations of State or Federal regulations.

No

22. Prior HISTORY OF EMERGENCIES.

No

23. Were PHOTOS taken? No

Date: July 23, 1981

Inspector's signature and title: Julie A. Smith WDOE

Hazardous Waste Inspector

RCRA COMPLIANCE INSPECTION FORM

Type of Notification: Interim Status Insp I.D.# WAD009282302

Site Name: Monsanto Co. Seattle Plant Address: 9223 E. Marginal Way S.
Seattle, WA 98108

Facility Contact(s): Melvin Miller

Title: Technical Services Dept. Super. Phone No.: (206) 764-4450

Owner: _____

Location: (Long., Lat., or Sec., Range, Twnshp.) 47-30-56N
122-18-10W

The Company acknowledges the following hazardous waste handling:

ALL 1. What type of ACTIVITIES are performed at the facility?

☒ GENERATE

☐ TREAT/RECYCLE

☒ STORE

☐ DISPOSE

☐ TRANSPORT (# OF VEHICLES _____)

☐ CLAIM QUANTITIES TOO SMALL TO BE REGULATED

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ALL 2. TYPE OF WASTE handled? (Chlorinated hydrocarbons, electroplating, sludge, etc.) Amount/mth, amount/yr?

Byproducts of vanillin making process. VBL3 (Vanillin Black liquor Sludges).

3% of Total VOLS and VSB (Vanillin still bottoms) go to Arlington each year, the rest is sold to other companies.

ALL 3. ADDITIONAL:

A. Has the waste material been ANALYZED? By whom?

Yes - St. Louis Monsanto lab & other labs.

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T/S/D

- B. Is the property FENCED? Are gates kept locked after hours?

Yes

Yes

T/S/D

- C. Is the property posted with SIGNS reading "Unauthorized Personnel Keep Out.", or similar warning sign?

Yes

T/S/D

- D. List other means to prevent UNAUTHORIZED ENTRY.

TV monitor.

T/S/D

- E. Is there a written INSPECTION SCHEDULE available?

Yes

T/S/D

- F. Is an INSPECTION LOG kept?

Yes - twice a week.

T/S/D

- G. Is there a TRAINING PLAN for personnel? What is the status of its implementation?

Yes, complete

T/S/D

- H. Are TRAINING RECORDS kept?

Yes

T/S/D

I. Are incompatible WASTES SEGREGATED?

NA

T/S/D

J. Is there FIRE FIGHTING EQUIPMENT on site?

Hose station, fire hydrants, fire extinguishers.

T/S/D

K. Is there AN ALARM SYSTEM on site?

Yes, hooked up to ADP.

T/S/D

L. Is there READY ACCESS to FIRE equipment and the ALARM system by personnel?

Yes

T/S/D

M. Is there ADEQUATE AISLE SPACE and access to all parts of the facility?

Yes

T/S/D

N. Is there a CONTINGENCY PLAN available?

Addendum to SPCC plan.

T/S/D

O. Is there an EMERGENCY COORDINATOR identified?

Yes

ALL 4. Is the MANIFEST SYSTEM used? What information is missing from manifest?

yes - they deal directly with chem-security,

T/S/D 5. Do OPERATING RECORDS include:

A. SOURCE, AMOUNT, and TYPE of wastes received.

NA

B. RESULTS of analyses.

C. LOCATION of stored wastes.

D. FINAL DISPOSITION of wastes.

T/S/D 6. Is GROUNDWATER MONITORED?

NO

They had a preliminary hydrogeologic survey done -

T/S/D 7. Is CLOSURE and POST-CLOSURE PLAN acceptable?

yes

G/T/S/D 8. Are there INTERNATIONAL SHIPMENTS of wastes? Reported?

NO

9. BARREL STORAGE: *Not shipped as a drum, shipped as a pile in a dump truck.*

T/S/D

A. Any STORAGE CONTAINERS not meeting requirements?

T/S/D

B. Any examples of INADEQUATE LABELING of containers?

NA

T/S/D

C. Are there 50' SET BACK violations of ignitable or reactive wastes?

not ignitable

G

D. Is there evidence indicating STORAGE greater than 90 days?

NO

10. BULK STORAGE: *NA*

G/T/S/D

A. Are BULK TANKS used to store hazardous wastes?

G/T/S/D

B. Are there TANK INSPECTION records?

G/T/S/D

C. Are there examples of IMPROPER MAINTENANCE of transfer equipment? Maintenance plan?

11. TRANSPORTERS: *NA*

T

A. How many VEHICLES in use?

T

B. List how many of each TYPE.

C. Comments:

12. LAGOONS/IMPOUNDMENTS: *NA*

- T/S/D A. Are IMPOUNDMENTS used to hold hazardous wastes?
- T/S/D B. Are such impoundments LINED?
- T/S/D C. Is there evidence of LEACHATE or LEAKING or OVERFLOW?

13. PILES:

- G/T/S/D A. Is LEACHATE and RUNOFF COLLECTED?
*Yes - leachate is collected and added to the
WBL which is sold.*
- G/T/S/D B. Is there need for an IMPERMEABLE BOTTOM?
NO

14. LANDFARM/LANDFILL: *NA*

- A. Hazardous waste used in a:
- D 1) LANDFARM
- D 2) LANDFILL
- D B. Evidence of NON-CONTAINMENT of runoff or leachate problem.
- D C. Improper RECORDS of type of material and location in the
fill?
- D D. Are LIQUIDS landfilled?

D E. Is landfill LINED?

15. INCINERATION: *NA*

T/D A. Is waste ANALYZED prior to incineration?

B. Comments:

16. THERMAL TREATMENT: *NA*

T/D A. What PROCESS is used? Are there problems?

B. Comments:

17. CHEMICAL/PHYSICAL/BIO-TREATMENT: *NA*

T A. What PROCESS(ES)?

B. Comments:

18. INJECTION: *NA*

D A. Describe:

19. ANNUAL REPORT:

A. Are records sufficient for compiling required ANNUAL REPORT?

yes

20. COMMENTS:

21. Prior HISTORY OF ENFORCEMENT or violations of State or Federal regulations.

NO

22. Prior HISTORY OF EMERGENCIES.

23. Were PHOTOS taken? NO

Date: 7/23/81

Inspector's signature and title: James B. Wilman

Sanitary Engineer